

Ex. 5 Deliberative Process (DP)

From: Dan Pope [mailto:DPope@css-inc.com]

Sent: Thursday, May 18, 2017 7:17 AM

To: d'Almeida, Carolyn K. <dAlmeida.Carolyn@epa.gov>; Henning, Loren <Henning.Loren@epa.gov>; Davis, Eva <Davis.Eva@epa.gov>; Cosler, Doug <Doug.Cosler@TechLawInc.com>; Brasaemle, Karla <KBrasaemle@TechLawInc.com>; Fairbanks, Brianna <Fairbanks.Brianna@epa.gov>

Cc: Wayne Miller (Miller.Wayne@azdeq.gov) <Miller.Wayne@azdeq.gov>

Subject: RE: 2017-5-16 - wafb - FYI - ADEQ comments on ST012 contaminant mass estimation process - LNAPL Volume Calcs - Mar 23 20017 - EBR - fpu17-197 - epa

Haven't checked all the details of course, but this certainly seems to present strong arguments. It's very useful for showing how little is known about the LNAPL, and what is somewhat known is still very uncertain – to orders of magnitude uncertainty, in some ways. And it's useful to show that not only is the AF model based on very questionable assumptions, but also the model is so poorly documented that it really cannot be properly understood and evaluated. I suspect that AF plans for building a parking lot would be more thoroughly documented and carefully evaluated than their EBR/LNAPL model.

From: d'Almeida, Carolyn K. [mailto:dAlmeida.Carolyn@epa.gov]

Sent: Wednesday, May 17, 2017 11:12 AM

To: Henning, Loren; Davis, Eva; Dan Pope; Cosler, Doug; Brasaemle, Karla; Fairbanks, Brianna

Subject: FW: 2017-5-16 - wafb - FYI - ADEQ comments on ST012 contaminant mass estimation process - LNAPL Volume Calcs - Mar 23 20017 - EBR - fpu17-197 - epa

Forwarding ADEQ comments from Bo suggesting AF's estimate of remaining LNAPL is significantly underestimated.

Carolyn d'Almeida

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"Because a waste is a terrible thing to mind..."

From: Wayne Miller [<mailto:Miller.Wayne@azdeq.gov>]
Sent: Tuesday, May 16, 2017 4:24 PM
To: d'Almeida, Carolyn K. <dAlmeida.Carolyn@epa.gov>
Cc: steve <steve@uxopro.com>; Bo Stewart <Bo@praxis-enviro.com>
Subject: 2017-5-16 - wafb - FYI - ADEQ comments on ST012 contaminant mass estimation process - LNAPL Volume Calcs
- Mar 23 20017 - EBR - fpu17-197 - epa

For your use.

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